

COMES NOW Plaintiff in the above-captioned case and requires Defendant Autoliv Japan, Ltd. (“Autoliv”) to designate representative(s) of defendant to

testify with respect to the following matters, pursuant to Fed.R.Civ.P. 30(b)(6), 30(b)(2) and 34.

The deposition will take place on March 8, 2016, at 9:00 am at the offices of Alston & Bird LLP, One Atlantic Center, 1201 West Peachtree Street, Atlanta, GA 30309-3424, upon oral examination for all purposes permitted by the Civil Practice Act before an officer duly authorized to administer oaths. This deposition will be taken by stenographic means and may be taken by videotape as well.

Pursuant to Fed.R.Civ.P. 30(b)(6), Autoliv is required to designate and fully prepare one or more officers, directors, managing agents or other persons who consent to testify on behalf of Autoliv, and whom Autoliv will fully prepare to testify regarding the following designated matters and as to such information that is known or reasonably available to Autoliv's organization:

1. Autoliv's role in designing, testing, manufacturing, marketing, distributing, and selling the subject seatbelt.
2. Changes that Mazda made to the subject seatbelt after it left Autoliv's control.

3. Whether the subject seatbelt was designed or manufactured to spool out¹ in a frontal collision with a roughly 35 mph Delta V, and how much it was designed or manufactured to spool out. If it was not designed or manufactured to spool out in a frontal collision with a roughly 35 mph Delta V, the reasons why it could spool out.
4. [Withdrawn]
5. The reasons Autoliv designed or manufactured the subject seatbelt such that it could spool out 20” in a frontal collision.
6. Whether Autoliv designs or manufacturers seatbelts to prevent the driver from impacting the steering wheel or other things inside the car during a frontal collision with a roughly 35 mph Delta V.
7. Whether Autoliv provided any warnings to consumers, or advised Mazda to provide any warnings to consumers, that in a frontal wreck the seatbelt may fail to keep the driver from striking the steering wheel. The reasons Autoliv did or did not provide such warnings to consumers. The reasons Autoliv did or did not advise Mazda to

¹ As used in this notice, the term “spool out” is intended as a synonym for “pay out”.

provide such warnings. The reasons Mazda did or did not provide such warnings to consumers.

8. The types of injuries and the likelihood of injury or death for a driver in frontal collisions with a roughly 35 mph Delta V when the seatbelt restrains the driver from striking the steering wheel. If Autoliv does not have this information, why Autoliv does not collect it.
9. The seatbelt designs that Autoliv had available and could have or did recommend to Mazda that would have limited spool out in frontal collisions or would have allowed less spool out than the subject retractor and the cost of those designs (including the cost of the Volvo S40 retractor). This includes designs with stronger torsion bars and limitations on the total amount of seatbelt spool out.

PLEASE TAKE NOTICE that that this document requests is deemed continuing. Should you in the future discover any information relating to any of the above matters of inquiry, you are required to notify the Plaintiff's counsel of this new or additional information by way of supplemental discovery responses, pursuant to Fed.R.Civ.P. 26(e). Objection will be made at trial to the use of information not properly disclosed in accordance with the Federal Rules of Civil Procedure.

Respectfully submitted this 3rd day of March, 2016.

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF COMPLIANCE

Pursuant to Local Rules 5.1(B) and 7.1(D), I hereby certify that the foregoing filing complies with the applicable font and size requirements and is formatted in Times New Roman, 14 point font.

s/ Tedra L. Cannella

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CERTIFICATE OF SERVICE

This is to certify that on March 3, 2016, I electronically filed SECOND AMENDED NOTICE OF 30(b)(6) DEPOSITION TO AUTOLIV JAPAN, LTD. with the Clerk of the Court using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record:

C. Bradford Marsh, Esq.
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This 3rd day of March, 2016.

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